

**IN THE DISTRICT COURT IN AND FOR WASHINGTON COUNTY
STATE OF OKLAHOMA**

REYNE ROWLAND, an Individual)
)
Plaintiff,)
)
VS.)
)
LOWE'S COMPANIES, INC.,)
a Foreign For-Profit Corporation, and)
LOWE'S HOME CENTERS, LLC, a)
Foreign Limited Liability Company,)
)
Defendant.)

Case No. *CS-2021-81*

Judge

JURY TRIAL DEMANDED

DISTRICT COURT WASHINGTON CO OK
JILL L. SPITZER COURT CLERK

FILED

JUN 21 2021

BY *[Signature]*

DEPUTY

PETITION

COMES NOW, Plaintiff, Reyne Rowland, an individual (hereinafter referred to as "Plaintiff"), by and through her attorneys, John M. Thetford and Grant B. Thetford of the Firm LEVINSON, SMITH & HUFFMAN, P.C., and for her cause of action against the Defendant, Lowe's Companies, Inc., a Foreign For-Profit Corporation, and Lowe's Home Centers, LLC., a Foreign Limited Liability Company.

1. That the Plaintiff, Reyne Rowland, is a citizen and resident of Bartlesville, Washington County, State of Oklahoma.

2. That the Defendant, Lowe's Companies, Inc. ("Lowe's Companies") is a Foreign For-Profit Corporation doing business in the State of Oklahoma and Washington County, State of Oklahoma. Defendant is listed with the North Carolina Secretary of State, is in existence, and has a registered agent, Ross McCanless, located at 1000 Lowe's Blvd. Mooresville, North Carolina 28117.

3. That the Defendant Lowe's Home Centers, LLC ("Lowes Home Centers") is a Foreign Limited Liability company doing business in the State of Oklahoma and Washington

County, State of Oklahoma. Defendant is listed with the Oklahoma Secretary of State and whose registered agent is the Corporation Service Company, located at 103000 Greenbriar Place, Oklahoma City, OK 73159.

4. Lowe's Companies and Lowe's Home Centers are referred to collectively as "Defendants".

5. Based upon information and belief, Lowe's Home Centers owns the property wherein this action arose.

6. Based upon information and belief, Lowe's Companies operates the Lowe's Store on such property.

7. The cause of action herein arose in Washington County, and this Court has jurisdiction over the parties and subject matter.

8. On or about September 21st, 2020, Plaintiff tripped and fell on a rope that was left in the Defendants' parking lot.

9. Defendants owed a duty to Plaintiff to maintain their premise with reasonable care.

10. Defendants failed to maintain their premises in a safe manner and failed to take reasonable care to maintain their premises.

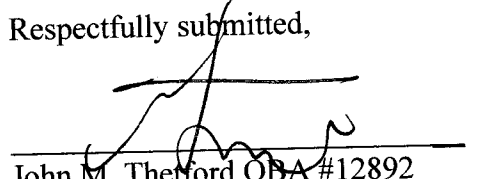
11. As a direct and proximate result of the negligence of Defendants, Plaintiff sustained injuries to her body as a whole; has been prevented from transacting her business; has suffered great pain of the body and mind; and has incurred expenses for medical attention for the injuries which she has sustained.

12. As a direct and proximate result of the negligence of the Defendants, Plaintiff will continue to suffer great pain of body and mind and will required further medical treatment in the future.

13. Defendants' actions on the date of the accident rose to a level of careless disregard and willful misconduct entitling Plaintiff to recover punitive damages in excess of \$75,000.00.

WHEREFORE, Plaintiff prays for judgment against Defendants Lowe's Companies, Inc. and Lowe's Home Centers, LLC in an amount in excess of Seventy-five Thousand Dollars (\$75,000.00), pre-judgment and post-judgment interest, cost and attorney fees, and all other relief, in law and equity, to which Plaintiff may show herself entitled and which this court finds just.

Respectfully submitted,



John M. Thetford OBA #12892
Grant B. Thetford OBA #33624
LEVINSON, SMITH & HUFFMAN, P.C.
1743 East 71st Street
Tulsa, Oklahoma 74136
(918) 492-4433 Telephone
(918) 492-6224 Facsimile
Attorneys for Plaintiff

ATTORNEY'S LIEN CLAIMED